

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

SAMUEL GONZALEZ CASTRO,
a/k/a "Klei,"
EFERSON MORILLO-GOMEZ,
a/k/a "Jefferson," and
JARWIN VALERO-CALDERON,
a/k/a "La Fama,"

Defendants.

JUDGE COTE

INDICTMENT

25 Cr.

25 CRM 41

COUNT ONE
(Conspiracy to Commit Carjacking)

The Grand Jury charges:

1. On or about September 30, 2024, in the Southern District of New York and elsewhere, SAMUEL GONZALEZ CASTRO, a/k/a "Klei," EFERSON MORILLO-GOMEZ, a/k/a "Jefferson," and JARWIN VALERO-CALDERON, a/k/a "La Fama," the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, carjacking, in violation of Title 18, United States Code, Section 2119.

2. It was a part and object of the conspiracy that SAMUEL GONZALEZ CASTRO, a/k/a "Klei," EFERSON MORILLO-GOMEZ, a/k/a "Jefferson," and JARWIN VALERO-CALDERON, a/k/a "La Fama," the defendants, and others known and unknown, would and did, with the intent to cause death and serious bodily harm, take a motor vehicle that had been transported, shipped, and received in interstate and foreign commerce from the person and presence of another by force and violence and by intimidation.

Overt Act

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, were committed in the Southern District of New York and elsewhere:

a. On or about September 30, 2024, SAMUEL GONZALEZ CASTRO, a/k/a “Klei,” and EFERSON MORILLO-GOMEZ, a/k/a “Jefferson,” the defendants—acting at the direction of JARWIN VALERO-CALDERON, a/k/a “La Fama,” the defendant—brandished and pointed guns at an employee of a car dealership (the “Victim”) and forcibly took possession of the Victim’s car in the Bronx, New York.

(Title 18, United States Code, Section 371.)

COUNT TWO
(Carjacking)

The Grand Jury further charges:

4. On or about September 30, 2024, in the Southern District of New York and elsewhere, SAMUEL GONZALEZ CASTRO, a/k/a “Klei,” EFERSON MORILLO-GOMEZ, a/k/a “Jefferson,” and JARWIN VALERO-CALDERON, a/k/a “La Fama,” the defendants, with the intent to cause death and serious bodily harm, took a motor vehicle that had been transported, shipped, and received in interstate and foreign commerce from the person and presence of another by force and violence and by intimidation, and aided, abetted, counseled, commanded, induced, and procured the same, to wit, CASTRO, MORILLO-GOMEZ, and VALERO-CALDERON participated in a scheme to forcibly take possession of the Victim’s car at gunpoint in the Bronx, New York.

(Title 18, United States Code, Sections 2119 and 2.)

COUNT THREE
(Hobbs Act Robbery)

The Grand Jury further charges:

5. On or about September 30, 2024, in the Southern District of New York and elsewhere, SAMUEL GONZALEZ CASTRO, a/k/a “Klei,” EFERSON MORILLO-GOMEZ, a/k/a “Jefferson,” and JARWIN VALERO-CALDERON, a/k/a “La Fama,” the defendants, knowingly committed robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided, abetted, counseled, commanded, induced, and procured the same, to wit, CASTRO, MORILLO-GOMEZ, and VALERO-CALDERON participated in a gunpoint robbery in the Bronx, New York of the Victim, who is an employee of a car dealership that does business in New York and New Jersey.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT FOUR
(Firearms Use, Carrying, and Possession)

The Grand Jury further charges:

6. On or about September 30, 2024, in the Southern District of New York and elsewhere, SAMUEL GONZALEZ CASTRO, a/k/a “Klei,” EFERSON MORILLO-GOMEZ, a/k/a “Jefferson,” and JARWIN VALERO-CALDERON, a/k/a “La Fama,” the defendants, during and in relation to crimes of violence for which they may be prosecuted in a court of the United States, namely, the carjacking charged in Count Two of this Indictment and the Hobbs Act robbery charged in Count Three of this Indictment, knowingly used and carried firearms, and in furtherance of such crimes, possessed firearms, and aided, abetted, counseled, commanded, induced, and

procured the use, carrying, and possession of firearms, which were brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and (ii), and 2.)

COUNT FIVE
(Attempted Hobbs Act Extortion)

The Grand Jury further charges:

7. From at least in or about September 2024 through at least in or about October 2024, in the Southern District of New York and elsewhere, SAMUEL GONZALEZ CASTRO, a/k/a “Klei,” EFERSON MORILLO-GOMEZ, a/k/a “Jefferson,” and JARWIN VALERO-CALDERON, a/k/a “La Fama,” the defendants, knowingly attempted to commit extortion, as that term is defined in Title 18, United States Code, Section 1951(b)(2), and thereby attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided, abetted, counseled, commanded, induced, and procured the same, to wit, CASTRO, MORILLO-GOMEZ and VALERO-CALDERON threatened to kill the Victim and members of the Victim’s family if the Victim did not provide CASTRO, MORILLO-GOMEZ, and VALERO-CALDERON with, among other things, vehicles from a car dealership that does business in New York and New Jersey.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT SIX
(Firearms Use, Carrying, and Possession – Conspiracy)

The Grand Jury further charges:

8. From at least in or about September 2024 through at least in or about October 2024, in the Southern District of New York and elsewhere, SAMUEL GONZALEZ CASTRO, a/k/a “Klei,” EFERSON MORILLO-GOMEZ, a/k/a “Jefferson,” and JARWIN VALERO-CALDERON, a/k/a “La Fama,” the defendants, and others known and unknown, intentionally and

knowingly combined, conspired, confederated, and agreed together and with each other to violate Title 18, United States Code, Section 924(c).

9. It was a part and an object of the conspiracy that SAMUEL GONZALEZ CASTRO, a/k/a “Klei,” EFERSON MORILLO-GOMEZ, a/k/a “Jefferson,” and JARWIN VALERO-CALDERON, a/k/a “La Fama,” the defendants, and others known and unknown, would and did, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, Hobbs Act extortion, in violation of 18 U.S.C. § 1951, knowingly use and carry one or more firearms, and, in furtherance of such crime, possess one or more firearms, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

(Title 18, United States Code, Section 924(o).)

FORFEITURE ALLEGATIONS

10. As a result of committing the offenses alleged in Counts One and Two of this Indictment, SAMUEL GONZALEZ CASTRO, a/k/a “Klei,” EFERSON MORILLO-GOMEZ, a/k/a “Jefferson,” and JARWIN VALERO-CALDERON, a/k/a “La Fama,” the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(5), any and all property, real and personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, as a result of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense and the following specific property: a Toyota 4Runner with VIN #JTEBU14R940035892.

11. As a result of committing the offenses alleged in Counts Three and Five of this Indictment, SAMUEL GONZALEZ CASTRO, a/k/a “Klei,” EFERSON MORILLO-GOMEZ, a/k/a “Jefferson,” and JARWIN VALERO-CALDERON, a/k/a “La Fama,” the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and

Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses and the following specific property: a Toyota 4Runner with VIN #JTEBU14R940035892.

12. As a result of committing the offenses alleged in Counts Four and Six of this Indictment, SAMUEL GONZALEZ CASTRO, a/k/a "Klei," EFERSON MORILLO-GOMEZ, a/k/a "Jefferson," and JARWIN VALERO-CALDERON, a/k/a "La Fama," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition involved in, used in, or intended to be used in said offenses, including but not limited to: a .380 caliber Smith & Wesson pistol with serial number #NDH6974, including ammunition recovered therein.

13. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 924, 981, and 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


[REDACTED]

FOREPERSON


Danielle R. Sasso
DANIELLE R. SASSOON
United States Attorney